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Commissioner

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Commissioner

Arizona Corporation Commission

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JUL 24 2002

AZ CORP COMMISSION  
DOCUMENT CONTROL

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IN THE MATTER OF QWEST )  
 CORPORATION'S COMPLIANCE WITH )  
 SECTION 252(e) OF THE )  
 TELECOMMUNICATIONS ACT OF 1996 )

Docket No. RT-0000F-02-0271

**AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC.'S**  
**FIRST SET OF DATA REQUESTS TO STAFF**

AT&T Communications of the Mountain States, Inc., ("AT&T") hereby  
 propounds the following data requests to the Staff of the Arizona Corporation  
 Commission ("Staff") to be answered by those employees, attorneys or agents of Staff as  
 may be cognizant of the requested information and who are authorized to answer on  
 behalf of Staff. Please provide full and complete responses to AT&T within 7 days of  
 your receipt of these data requests.

**DEFINITIONS**

As used herein, the following terms have the meaning as set forth below:

1. The terms "Staff," "you," and "your" shall include attorneys, employees, servants, agents and representatives, and any person acting on their behalf for any purpose.
2. "List," "describe," "explain," "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which Staff or its agents or representatives have knowledge which is relevant to the answer called for by the interrogatory.

3. The terms "document" or "documents" as used herein shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including, but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:
  - (a) are now or were formerly in your possession, custody or control; or
  - (b) are known or believed to be responsive to these interrogatories, regardless of who has or formerly had custody, possession or control.
4. The terms "identify" and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.
5. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.
6. The terms "identify" and "identity" with respect to a document mean to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in the possession of Staff or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization for, such disposition, and state the date or approximate date of such disposition.

7. The terms "identify" and "identity" with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.
8. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.
9. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.
10. The term "including" means "including, but not limited to."
11. The term "CLEC" means any competing local exchange carrier not affiliated with U S WEST, regardless of whether the carrier is presently providing local telephone exchange services in the State of Arizona.

### **INSTRUCTIONS**

A. These data requests shall be deemed to be continuing. Staff is obliged to change, supplement, and correct all answers to interrogatories and responses to the production request to conform to available information, including such information as first becomes available to Staff after the answers and production of documents hereto are filed and made, should additional information become known or should information supplied in the answers or documents prove to be incorrect or incomplete.

B. The Response to each data request provided should first restate the question asked and also identify the person(s) supplying the information.

C. In answering these data requests, furnish all information that is available to you or may be reasonably ascertained by you, including information in the possession of any of your agents or attorneys, or otherwise subject to your knowledge, possession, custody or control.

D. If in answering these data requests you encounter any ambiguity in construing the request or a definition or instruction relevant to the inquiry contained

within the interrogatory or request, set forth the matter deemed "ambiguous" and set forth the construction chosen or used in answering the interrogatory or responding to the request.

E. If you object to any part of a request, answer all parts of such requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, contained in a document, set forth with respect to the document:

- (i) the date and number of pages of the document;
- (ii) the identity of the author(s) and/or preparer(s);
- (iii) the identity of the addressee, if any;
- (iv) the title;
- (v) the type of tangible thing (e.g., letter, memorandum, telegram, chart, report, recording disc);
- (vi) the subject matter (without revealing the information as to which privilege or protection from non-disclosure is claimed);
- (vii) the identity of each person who has received the document or to whom knowledge of the contents of the document was communicated;
- (viii) the identity of the present custodian(s);
- (ix) the nature of your claim of non-discoverability (e.g., attorney-client privilege); and
- (x) each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit the Joint Intervenors to make a full determination as to whether your claim is valid.

### **DATA REQUESTS**

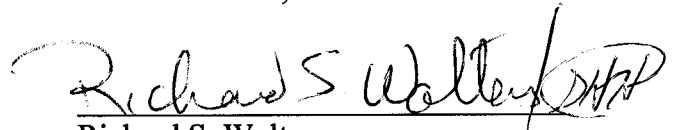
1. Provide copies of all answers, including documents, received by Staff in response to Arizona Corporation Commission Staff's First Set of Data request identified in Exhibit A to Staff's Memorandum from Maureen A. Scott, Attorney, Legal Division, dated June 28, 2002. If answers were received orally, provide copies of all notes

evidencing such communications. If no notes were taken, summarize the contents of such communications.

2. Provide copies of all answers, including documents, received by Staff in response to Arizona Corporation Commission Staff's Second Set of Data Requests identified in Exhibit B to Staff's Memorandum from Maureen A. Scott, Attorney, Legal Division, dated June 28, 2002. If answers were received orally, provide copies of all notes evidencing such communications. If no notes were taken, summarize the contents of such communications.
3. Provide copies of all answers, including documents, received by Staff in response to Arizona Corporation Commission Staff's First Set of Data Requests to Qwest identified in Exhibit D to Staff's Memorandum from Maureen A. Scott, Attorney, Legal Division, dated June 28, 2002.

Dated this 23<sup>rd</sup> day of July, 2002.

AT&T Communications of the  
Mountain States, Inc.



Richard S. Wolters  
1875 Lawrence St. Suite 1503  
Denver, CO 80202  
(303) 298-6741  
rwolters@att.com

Gregory H. Hoffman  
795 Folsom Street, Suite 2161  
San Francisco, CA 94107-1243  
(415) 442-3776  
greghoffman@att.com

## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T Communications of the Mountain States, Inc.'s First Set of Data Requests to Staff**, Docket No. RT-00000F-02-0271, were sent by Overnight Delivery on July 23, 2002 to:

Arizona Corporation Commission  
Docket Control – Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

and that a copy of the foregoing was sent by Overnight Delivery on July 23, 2002 to:

Christopher Kempley, Chief Counsel  
Arizona Corporation Commission  
Legal Division  
1200 West Washington  
Phoenix, AZ 85007

\*Maureen Scott  
Legal Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

Earnest G. Johnson, Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

Judge Jane Rodda  
Arizona Corporation Commission  
400 W. Congress  
Tucson, Arizona 85701

and a true and correct copy was sent by U.S. Mail, postage prepaid, on July 23, 2002 to:

Eric S. Heath  
Sprint Communications Company L.P.  
100 Spear Street, Ste. 930  
San Francisco, CA 94105

QWEST Corporation  
1801 California Street, #5100  
Denver, Colorado 80202

Joan Burke  
Osborn Maledon  
2929 North Central Avenue, 21<sup>st</sup> Floor  
P.O. Box 36379  
Phoenix, AZ 85012-2794

Maureen Arnold  
U S WEST Communications, Inc.  
3033 N. Third Street, Room 1010  
Phoenix, Arizona 85012

Timothy Berg  
FENNEMORE CRAIG  
3003 N. Central Ave., Suite 2600  
Phoenix, Arizona 85016

Gregory Hoffman  
795 Folsom Street, Room 2159  
San Francisco, CA 94107-1243

\* Received by email on July 23, 2002.

Thomas F. Dixon  
MCI TELECOMMUNICATIONS CORP  
707 17th Street, #3900  
Denver, Colorado 80202

Michael M. Grant  
GALLAGHER AND KENNEDY  
2575 East Camelback Road  
Phoenix, Arizona 85016-9225

Bradley Carroll  
Cox Arizona Telcom, L.L.C.  
20401 N. 29<sup>th</sup> Avenue, Suite 100  
Phoenix, Arizona 85027

Mark Dioguardi  
TIFFANY AND BOSCO PA  
500 Dial Tower  
1850 N. Central Avenue  
Phoenix, Arizona 85004

Nigel Bates  
ELECTRIC LIGHTWAVE, INC.  
4400 NE 77<sup>th</sup> Avenue  
Vancouver, Washington 98662

Darren S. Weingard  
Stephen H. Kukta  
SPRINT COMMUNICATIONS CO L.P.  
1850 Gateway Drive, 7<sup>th</sup> Floor  
San Mateo, California 94404-2467

Thomas H. Campbell  
LEWIS & ROCA  
40 N. Central Avenue  
Phoenix, Arizona 85007

Jon Loehman  
Managing Director-Regulatory  
SBC Telecom, Inc.  
5800 Northwest Parkway, Ste 135, Rm. 1.S.40  
San Antonio, Texas 78249

Scott S. Wakefield, Chief Counsel  
Dan Pozefsky  
RUCO  
2828 N. Central Avenue, Suite 1200  
Phoenix, Arizona 85004

Andrew O. Isar  
TRI  
4312 92<sup>nd</sup> Avenue, N.W.  
Gig Harbor, Washington 98335

Richard M. Rindler  
Morton J. Posner  
SWIDER & BERLIN  
3000 K Street, N.W. Suite 300  
Washington, DC 20007

Michael W. Patten  
ROSHKA HEYMAN & DEWULF  
400 E. Van Buren, Suite 800  
Phoenix, Arizona 85004

Thomas L. Mumaw  
Jeffrey W. Crockett  
SNELL & WILMER  
One Arizona Center  
Phoenix, Arizona 85004-0001

Joyce Hundley  
UNITED STATES DEPARTMENT OF  
JUSTICE  
Antitrust Division  
1401 H Street NW, Suite 8000  
Washington, DC 20530

Mark P. Trincherro  
DAVIS WRIGHT TREMAINE LLP  
1300 S.W. Fifth Avenue, Suite 2300  
Portland, Oregon 97201

Daniel Waggoner  
DAVIS WRIGHT TREMAINE  
2600 Century Square  
1501 Fourth Avenue  
Seattle, WA 98101-1688

Lyndall Nipps  
Director, Regulatory  
Allegiance Telecom, Inc.  
845 Camino Sure  
Palm Springs, California 92262

M. Andrew Andrade  
5261 S. Quebec Street, Suite 150  
Greenwood Village, CO 80111  
Attorney for TESS Communications, Inc.

Diane Bacon, Legislative Director  
COMMUNICATIONS WORKERS OF  
AMERICA  
5818 North 7<sup>th</sup> Street, Suite 206  
Phoenix, Arizona 85014-5811

Al Sterman  
ARIZONA CONSUMERS COUNCIL  
2849 E 8th Street  
Tucson Arizona 85716

Brian Thomas  
TIME WARNER TELECOM, INC.  
520 S.W. 6<sup>th</sup> Avenue, Suite 300  
Portland, Oregon 97204

Robert S. Tanner  
3311 3rd Street N  
Arlington, VA 22201-1711

Jim Scheltema  
Blumenfeld & Cohen  
1625 Massachusetts Ave. N.W., Suite 300  
Washington, DC 20036

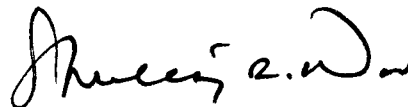
Todd C. Wiley  
GALLAGHER & KENNEDY  
2575 E. Camelback Road  
Phoenix, Arizona 85016-9225

Laura Izon  
COVAD COMMUNICATIONS CO  
4250 Burton Street  
Santa Clara, California 95054

Mark N. Rogers  
Excell Agent Services, L.L.C.  
2175 W. 14<sup>th</sup> Street  
Tempe, Arizona 85281

Jon Poston  
ACTS  
6733 E. Dale Lane  
Cave Creek, Arizona 85331-6561

Executed on July 23, 2002 in San Francisco, California.



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Shirley S. Woo